

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MMAS RESEARCH, LLC,

Plaintiff,

vs.

THE CHILDREN'S HOSPITAL
CORPORATION, et al.,

Defendants

Civ. A. No. 1:24-cv-12108-DJC

DECLARATION OF THEODORE J. FOLKMAN

I, Theodore J. Folkman, make the following declaration.

1. I am counsel to the defendant, The Children's Hospital Corporation, in this action.

I was admitted to the bar of this Court in 2002 and have been continually in good standing since that time.

2. Attached to this declaration as Exhibit 1 is a true copy of an email I received from counsel for the plaintiff on December 8, 2025.

I declare that the foregoing is true and correct. Executed on December 14, 2026

/s/ Theodore J. Folkman